

TRULINCS 80637053 - BASLAN, BEBARS - Unit: BRO-I-C

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FROM: Savitt, Ephraim  
TO: 80637053  
SUBJECT: RE: Question  
DATE: 02/02/2015 05:06:03 PM

Yes, that's fair. E

BEBARS BASLAN on 2/2/2015 12:36:23 PM wrote  
Hi E,

Would it be fair to say, that you never witnessed me in an agitated state, not that I have never raised my voice on you, or ever been disrespectful or profane in your presence?

Thank you

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FROM: Savitt, Ephraim  
TO: 80637053  
SUBJECT: RE: PSI  
DATE: 08/05/2014 09:06:03 PM

I will see you in the Marshal's pen before court. It's important that we resolve this between us before we appear. Best, E

BEBARS BASLAN on 8/5/2014 3:21:31 PM wrote

E, I am not asking you to be relived, and I have not even made any decisions, we were in the middle in talking about it, and then well, you were gone.

I have never been once unreasonable in listening, I just want to be informed. I feel badly for the financial hit, and I did not want to cause it. As I was under the impression that we will raise my objections, then pressure the 29(c) based on 8th amend, and maybe 33 based on pressure for time, and 35 with the other issues that we discussed, I have actually in the middle of telling about some info that fell in my lap about a big case, about CI involved, and that was a big one. I think even if I do not get any benefit from it, I need to report it because it is the right thing to do, but I need your help on that.

Anyhow, maybe we can talk briefly before the hearing.

thank you for the stuff, I would just like to make sure I get the affidavits from the messiah motion, they were my only copies. And any folder of cases that I gave you that you do not need/ notes etc.

thank you so much

See you then

-----Savitt, Ephraim on 8/5/2014 1:06 PM wrote:

>

Acknowledged. Can do Carridi, emails, CD of trial. Transcripts bound to be mailed.. But don't overload yourself on way to Court. I will respect your issues, as I am doing by asking to be relieved.. It's a financial hit, of sorts, for me, and I am very sympathetic to your plight. But my approach to cutting your punishment differs significantly from yours. I hope that a new lawyer will harmonize with you in a successful approach. See you Thursday. Best, E

BEBARS BASLAN on 8/5/2014 10:08:46 AM wrote

Great,

would you please bring everything you need to give me to court.

1- transcripts for trial printer, and if possible a cd version.

2- communications with AUSA

3- paper work that I have given you, including the messiah affidavits from other people, and a print out of the carridi file, and the signed affidavits from the girls. this is the most important.

i am sorry to bother you, but I really need that stuff to go on to my next step, can we just please do it, and I hope not to bother you anymore unless we forgot something.

please acknowledge that you received this. and if you agree to it.

thank you

-----Savitt, Ephraim on 8/4/2014 8:51 PM wrote:

>

We have a status Thurs, at 11 on my application to be relieved. Best, E

BEBARS BASLAN on 8/4/2014 1:05:30 PM wrote

Hi E

Just to be clear, yes I would like the PSI pushed back till the next attorney. I would not want to go through it, until after the post

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trial motions if possible..

Thank you

-----Savitt, Ephraim on 8/3/2014 11:36 PM wrote:

>

Of course. And you were always a gentleman and respectful. I was hoping that your punishment be proportional to your actions. The 30- year mandatory minimum is nothing less than cruel and unusual and should not be applied in your case. Best, E

BEBARS BASLAN on 8/3/2014 8:50:49 PM wrote  
Hi E

You already indicated that I am entitled to those. And I am sure that the gov will reimburse you.

1- Can I get the trial transcripts in print (paper format), if it would not be too much to ask may I have a pdf copy on a DVD as well for the future, in case paper gets lost.

2- The withdraw letter.

3- A copy of all communication with Prosecutor. Just so I know what was said from their side and so on.

4- A copy of my file and all notes and files / print out I have given you in the past, including the Cariddi file.. Would you please bring this to court when we have the withdraw hearing, I assume you will be present then. If not then here.

Thank you  
So much.

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FROM: Savitt, Ephraim  
TO: 80637053  
SUBJECT: RE: Sorry I missed your call.  
DATE: 09/21/2014 12:51:01 PM

BB. Hope you are well. I plan on putting together a preliminary first draft of the Eighth Amendment point this week, hopefully before Rosh Hashana, and certainly by next Monday, for your review. I intend to complete the Messiah point by mid next week. Please let me get that work out of the way before we meet for a comprehensive review of the comprehensive draft Rule 29/33 memo. We can then make our adjustments with a clear idea and agreement of how the final will be.  
Best for a shana tovah. E

BEBARS BASLAN on 9/18/2014 11:20:20 AM wrote  
I shall shortly thank you  
-----Savitt, Ephraim on 9/18/2014 10:51 AM wrote:

>

Ty. Please call me before the count. E

BEBARS BASLAN on 9/17/2014 9:41:09 PM wrote  
I am very glad to hear, so you want me to call you early, or I will see you in person?

Good night  
-----Savitt, Ephraim on 9/17/2014 8:51 PM wrote:

>

Hi, According to my doctor, the early reports of my impending death have been greatly exaggerated. Speak to you tomorrow early pm. Ty for your concern. E

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FROM: Savitt, Ephraim  
TO: 80637053  
SUBJECT: RE: Sorry I missed your call.  
DATE: 09/21/2014 05:51:02 PM

Sorry. Was unavailable. Propose meeting is Mon, Sept 29 or Tu, Set 30. Can get a substantial draft to you prior to meeting. E

BEBARS BASLAN on 9/21/2014 2:50:14 PM wrote  
E, please let me know when it is convenient for me to call you.  
When is your proposed meeting date?  
Thank you  
-----Savitt, Ephraim on 9/21/2014 12:51 PM wrote:

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FROM: Savitt, Ephraim  
TO: 80637053  
SUBJECT: RE: IMPORTANT  
DATE: 09/30/2014 01:06:05 PM

BB. Ty again. You are a true mentch. Gmar chatimah tovah. E

BEBARS BASLAN on 9/30/2014 10:34:45 AM wrote

E, again I hope that everything goes well with you, I know that there is still time to do this the right way, and please note that I 100% appreciate your medical situation.

Just to be sure I would like it mailed express to Legal Mail, as well as soon as you have a send-able draft, not sure at this point who I acquaint more with a mirage of a beautiful oasis, you or Ying (hey at least I think of you as a beautiful oasis) :-)

Unless you are 100% sure that Ying will be here this week, I really do not want to end up seeing the motion after we file it, or not be able to have input on content, YOU PROMISED ME that this will not happen. So please as a backup please send it to me.

My goal and I hope I seem reasonable, that mange this around the medical issues and without disturbing them, and with keeping a good flow.

I am davening for you, and whatever it is, I know that you will beat it.

-----Savitt, Ephraim on 9/29/2014 10:06 PM wrote:

>

Hi, BB. We won't because I have a medical consult with a specialist tomorrow mid day in Midtown, and a medical probe scheduled for Thurs am. And I'm quite ill.

Now, for the positive news. The draft memo is now 42 pages long. I expect it will end up being 55-60 pages. I have been working like a dog with a Yiddish brain on this the last couple of days. Just about to leave office now..

The draft will be completed by Wed evening. If Ying is coming Thurs or Fri, I will send it as an email attachment to her. I'm sure she will be able to deliver the memo to you and Kristen, as you are both affected by the issues raised in our motions.

Yours in health ( or an approximation thereof), E

BEBARS BASLAN on 9/29/2014 7:07:19 AM wrote  
Hello E

I hope you had good time over Rosh Hashanah

PLEASE PLEASE PLEASE bring the following with you ~

1- The Government wrote a response to the two letter I sent to the judge before trial, the delay request and the experts. I never saw those please bring.

2- Please bring me a copy of our first omnibus motion.

3- Please bring me a copy of the judge opinions to Massaiah Hearing. So we can go over it.

As far as the transcripts, I am renewing (but without any realistic hope) my reminder.

Do you know what time we will be seeing each other tomorrow?

Thank you  
Bebars

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FROM: 80637053  
TO: Savitt, Ephraim  
SUBJECT: Thank  
DATE: 10/15/2014 07:15:58 PM

Thank you for the visit.

I am glad of the two ;) concession that I got out of you, one I already say in the foot note of the motion, and the other to be put in an application, and thank you for that, please let me know when you get that application filed.

If you are ever here, and can do another quick session like today, I would love to see you, there is one factual error about motion that I would like to explain to you, I understand it may not be important, but however, since dear AUSA S, formidable style centers on nit picking on every detail, I want to know if we can correct it before hand.

Other than that, I hope all is well

when does the trial actually start.

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FROM: 80637053  
TO: Savitt, Ephraim  
SUBJECT: RE: RE: Sorry I missed your call.  
DATE: 12/02/2014 01:48:10 PM

Hello E, I am well and I hope you are too.

I understand, and I am not trying to be difficult. And I have to preserve the record, and I already resolved myself that you will not meet this week. "I" am facing 30 years, so I am going to say this. I beg your pardon, for it,

I accept what you are saying, but please I do not need this to be a repeat of our pretrial motions, where I was not able to contribute, nor I was able to review, this is not to be taken as disparaging remarks about the motions.

About the 8th amendment, I understand, and I get it.

About the messiah violation however I do not, when it came to this motion we only had the one 20 minute rushed meeting (meeting before got cut short, and that was the last time we met).

My points about the pre-trial motions were validated by the judge, and while I understand that in the over all picture, that injustice, may offer a silver lining now, I do not want to make the same mistake. As it was in the pretrial motions, this is not a strategy difference, this is and was (when it came to the motion) a matter of direction to the case.

You promised me this time, that I will participate in the making of the motion, and I do not see how a draft can be completed without at least a meeting were you get to know what I want.

So, all I want to meet before the Work for the Messiah motion will start. So give me a date.

-----Savitt, Ephraim on 9/21/2014 12:51 PM wrote:

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